

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

PATRICK KELLETT, et al.,	)	
	)	
Plaintiffs,	)	
	)	Case No. 4:10CV1747-SNLJ
v.	)	
	)	
ACCURATE BACKFLOW SYSTEMS,	)	
LLC,	)	
	)	
Defendant.	)	

**AFFIDAVIT OF GREG A. CAMPBELL**

Comes now Greg A. Campbell, upon his oath and states as follows:

1. I am a partner in the law firm of Hammond and Shinnors, P.C. and the attorney for plaintiffs, Trustees of the Plumbers and Pipefitters Welfare Educational Fund, the Plumbers and Pipefitters Pension Fund, and the Plumbers and Pipefitters Local 562 Supplemental Pension Plan and Trust, (hereinafter, the "Plumbers & Pipefitters Funds") with regard to the above-styled cause. I am a member of the Missouri Bar, and I am authorized to practice before this Court.

2. Our firm specializes in labor law and employee benefit law and represents numerous labor organizations and employee benefit trusts in the St. Louis metropolitan area. Our firm's standard hourly billing rate for lawyer's services performed in connection with federal court litigation for delinquency matters is \$170.00 for partners. Our firm's standard hourly billing rate for legal assistant services performed in connection with federal court litigation for delinquency matters is \$80.00.

3. Our billing records reflect that I performed a total of 1.1 hours of services regarding this matter. In addition, our billing records reflect that Alice Divinny, legal assistant, performed a total of 3.2 hours of services regarding this matter. These services include review of documents, numerous telephone calls and email messages to and from the Fund office; correspondence to defendant; obtaining corporate information from the Secretary of State; drafting the complaint and related documents; reviewing spreadsheet; calculating amounts owed; drafting request for entry of default by clerk; and drafting

motion for default judgment, affidavits and related documents. These services were, in my opinion, reasonable and necessary in connection with this type of litigation in the federal courts. Plaintiffs have or will be billed \$ for legal services provided in this matter. Plaintiffs have or will be billed \$350.00 for the filing fee and \$159.50 for service of the summons and complaint by special process server.

4. Therefore, plaintiffs seek and request an award of legal fees in the amount of \$443.00 and \$509.50 in costs for a total of \$952.50.

Further affiant sayeth not.

  
GREG A. CAMPBELL

Subscribed and sworn to before me this 29<sup>th</sup> day of December 2010.



ALICE DIVINNY  
My Commission Expires  
December 16, 2011  
St. Louis County  
Commission #07539869

  
NOTARY PUBLIC

HAMMOND AND SHINNERS, P.C.  
7730 Carondelet, Suite 200  
St. Louis, Missouri 63105  
Phone: (314) 727-1015  
Fax: (314) 727-6804

/s/ Greg A. Campbell  
GREG A. CAMPBELL, #35381MO

Attorneys for Plaintiffs

### CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing has been electronically filed with the Court on December 29, 2010 and a copy has been mailed to the following non-participant in e-filing: Accurate Backflow Systems, LLC, 3853 S. Broadway, St. Louis, MO 63118.

/s/ Greg A. Campbell